

EXHIBIT 5

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

CIVIL ACTION NO. 22-CV-2420

* * * * *

LACI N. BLANCHARD, Individually, and as next friend
of W.B., surviving minor child of RONNIE P.
BLANCHARD, JR.

VERSUS

SANARE ENERGY PARTNERS LLC, et al

* * * * *

The Video and Oral deposition of CAPTAIN KIM
HART LIBERSAT, taken in connection with the
captioned cause, pursuant to the following
stipulations before Debra Smith, Certified Court
Reporter, at the offices of ALL COAST, LLC, 151
Southpark, 3rd Floor, Lafayette, Louisiana, on the
10th day of December, 2024, beginning at 10:44 a.m.

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22 VIDEOGRAPHER - ISSAC BRUCE

S T I P U L A T I O N

It is hereby stipulated by and among counsel for plaintiff and counsel for defense that the Video and Oral deposition of

CAPTAIN KIM HART LIBERSAT

be taken before Debra Smith, Certified Court Reporter, by counsel for the plaintiff for all purposes, pursuant to notice and to the provisions of the appropriate statutes of the Federal Rules of Civil Procedure.

The parties hereto waive all formalities in connection with the taking of said deposition, including the reading and signing thereof, except the swearing of the witness and the reduction of the questions and answers to typewriting.

Counsel for all parties reserve all objections, except as to the form of the question and responsiveness of the answer, until the time of the trial of this matter.

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1 A Can I see the statement?

2 MR. LONG:

3 Q Yeah. I can show you the statement. I just --
4 I want to know what you know first and then
5 I'll show you what's in the statement. But --
6 but just generally, what -- what do you recall
7 happened?

8 A I was -- I was in my room doing paperwork and
9 then somebody hollered. We -- we all have VHF
10 radios, that's how we communicate between the
11 crane operator, the contractors. And somebody
12 said on the VHF radio that they had a accident.

13 Q Okay. Did you see the tower fall into the
14 water?

15 A No.

16 Q Okay. But at some point you -- the first
17 awareness you were made of the incident was
18 through the loudspeaker or somebody shouting it
19 to you or did someone call you?

20 A VHF radio, yes.

21 Q Okay. And what did you do when you heard it on
22 the radio?

23 A I left my room and I went to the wheelhouse.

24 Q Okay. And at that -- at that time when you're
25 in the wheelhouse could you see the rig-up